UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BANQUE CANTONALE VAUDOISE,

Defendant.

Adv. Pro. No. 12-01694 (SMB)

## STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Banque Cantonale Vaudoise ("Defendant"), may answer, move against, or otherwise respond to the Trustee's complaint ("Complaint") is extended up to and including October 30, 2014. The pre-trial conference will be adjourned from October 22, 2014, at 10:00 a.m. to January 28, 2015, at 10:00 a.m.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for the Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendant's right to request from the Court a further extension of time to answer, move against, or otherwise respond to the Complaint and/or the Trustee's right to

object to any such request.

The parties to this Stipulation reserve all other rights and defenses they may have, and

entry into this Stipulation shall not impair or otherwise affect such rights and defenses,

including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of

which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be

deemed an original. This Stipulation is entered into pursuant to the Order Granting

Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial

Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: August 18, 2014

New York, New York

/s/ Thomas L. Long

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LLC and the Estate of Bernard L. Madoff

/s/ John F. Zulack

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